

EXHIBIT A

Dalsen, William D.

From: Sloane, Cheryl Tedeschi <csloane@whitecase.com>
Sent: Tuesday, March 12, 2019 3:35 PM
To: Sooknanan, Sparkle L.; Mazurek, Carl A.; Bennett, Bruce S.; Rosenblum, Benjamin; Stewart, Geoffrey S.; Heifetz, Beth R.; Cunningham, John K.; Zakia, Jason; de la Hoz, Fernando; afernandez@delgadofernandez.com; 'jsanchez@sanpir.com'; 'alavergne@sanpir.com'; 'mvazquez@sanpir.com'; Martin, Moneyede
Cc: pfriedman@omm.com; suhland@omm.com; lucdespins@paulhastings.com; 'Bassett, Nicholas'; csteege@jenner.com; Dale, Margaret A.; Rosen, Brian S.; Levitan, Jeffrey W.; Possinger, Paul V.; Perra, Kevin J.; Roche, Jennifer L.; Dalsen, William D.; Theodoridis, Chris; Esses, Joshua; dvelawoffices@gmail.com
Subject: RE: In re Commonwealth of Puerto Rico et al. (17-bk-3283) / In re Employees Retirement System of the Government of Puerto Rico (17-bk-3566)

Counsel,

The Rule 30(b)(6) deposition notice served on the PR Funds is identical to those Rule 30(b)(6) notices served on the other Movants; therefore, it too is grossly overbroad and burdensome for the reasons set forth below. In addition, we add that Topics 1 and 3 are also outside the scope of discovery, which is limited to the diminution of collateral during the pendency of the automatic stay. We will be available to discuss at a mutually convenient time.

Regards,
Cheryl

Cheryl Sloane | Associate
T +1 305 925 4783 M +1 786 457 4984 E csloane@whitecase.com
White & Case LLP | Southeast Financial Center
200 South Biscayne Boulevard, Suite 4900 | Miami, FL 33131-2352

From: Sooknanan, Sparkle L. <ssooknanan@jonesday.com>
Sent: Tuesday, March 12, 2019 2:40 PM
To: Mazurek, Carl A. <cmazurek@proskauer.com>; Bennett, Bruce S. <bbennett@jonesday.com>; Rosenblum, Benjamin <brosenblum@JonesDay.com>; Stewart, Geoffrey S. <gstewart@JonesDay.com>; Heifetz, Beth R. <bheifetz@JonesDay.com>; Cunningham, John K. <jcunningham@whitecase.com>; Kurtz, Glenn <gkurtz@whitecase.com>; Zakia, Jason <jzakia@whitecase.com>; Sloane, Cheryl Tedeschi <csloane@whitecase.com>; afernandez@delgadofernandez.com; 'jsanchez@sanpir.com' <jsanchez@sanpir.com>; 'alavergne@sanpir.com' <alavergne@sanpir.com>; 'mvazquez@sanpir.com' <mvazquez@sanpir.com>
Cc: pfriedman@omm.com; suhland@omm.com; lucdespins@paulhastings.com; 'Bassett, Nicholas' <nicholasbassett@paulhastings.com>; csteege@jenner.com; Dale, Margaret A. <mdale@proskauer.com>; brosen@proskauer.com; JLevitan@proskauer.com; ppossinger@proskauer.com; kperra@proskauer.com; Roche, Jennifer L. <jroche@proskauer.com>; wdalsen@proskauer.com; Theodoridis, Chris <ctheodoridis@proskauer.com>; Esses, Joshua <JEsses@proskauer.com>; dvelawoffices@gmail.com
Subject: RE: In re Commonwealth of Puerto Rico et al. (17-bk-3283) / In re Employees Retirement System of the Government of Puerto Rico (17-bk-3566)

Counsel,

I am writing in response to the Rule 30(b)(6) deposition notices served on March 7 to Andalusian Global Designated Activity Company and Mason Capital Master Fund, LP. The notices are grossly overbroad and burdensome. The itemization of the testimony sought goes on for two pages and comprises 23 different topics. Even a cursory review shows that most are irrelevant, argumentative or improper. Topics 1 and 3, for example, asks about the issuance of the ERS bonds when you well know that our clients bought the bonds years after their issues. Topics 5-10 and 19-21, ask for

legal conclusions, inappropriate testimony for a lay witness. Topics 12 and 13 ask for testimony about years of communications with the Fiscal Agent, a matter of no clear relevance to this motion. Topic 14 asks for matters not within the witness' knowledge. Topics 15 to 18 are about the contentions made in the pleadings, again not a topic for a lay witness. Topics 22 and 23 are in conflict with provisions of Judge Swain's scheduling order.

To avoid motion practice, we would ask you to narrow the scope of the requests to reasonable boundaries. We are available to meet and confer with you at mutually convenient times.

Thank you,
Sparkle

Sparkle L. Sooknanan
Associate
[JONES DAY® - One Firm WorldwideSM](#)
51 Louisiana Ave, NW
Washington, DC 20001
Office +1.202.879.3435

From: Mazurek, Carl A. <cmazurek@proskauer.com>
Sent: Thursday, March 7, 2019 10:02 PM
To: Bennett, Bruce S. <bbennett@jonesday.com>; Rosenblum, Benjamin <brosenblum@JonesDay.com>; Stewart, Geoffrey S. <gstewart@JonesDay.com>; Heifetz, Beth R. <bheifetz@JonesDay.com>; Sooknanan, Sparkle L. <ssooknanan@jonesday.com>; jcunningham@whitecase.com; gkurtz@whitecase.com; jzakia@whitecase.com; csloane@whitecase.com; afernandez@delgadofernandez.com; 'jsanchez@sanpir.com' <jsanchez@sanpir.com>; 'alavergne@sanpir.com' <alavergne@sanpir.com>; 'mvazquez@sanpir.com' <mvazquez@sanpir.com>
Cc: pfriedman@omm.com; suhland@omm.com; lucdespins@paulhastings.com; 'Bassett, Nicholas' <nicholasbassett@paulhastings.com>; csteeg@jenner.com; Dale, Margaret A. <mdale@proskauer.com>; brosen@proskauer.com; JLevitan@proskauer.com; ppossinger@proskauer.com; kperra@proskauer.com; Roche, Jennifer L. <jroche@proskauer.com>; wdalsen@proskauer.com; Theodoridis, Chris <ctheodoridis@proskauer.com>; Esses, Joshua <JEsses@proskauer.com>; dvelawoffices@gmail.com
Subject: In re Commonwealth of Puerto Rico et al. (17-bk-3283) / In re Employees Retirement System of the Government of Puerto Rico (17-bk-3566)

Counsel –

Attached please find individual and Rule 30(b)(6) notices of deposition.

We are sending these notices as required under the Court's current schedule for Movants' motion, but acknowledge that the parties have been in discussions concerning the schedule for that motion and that the noticed dates are likely to change following further discussions. As such, we are serving these notices without prejudice to supplementing or withdrawing those notices, and without prejudice to serving any additional notices or subpoenas for deposition, in accordance with any new schedule.

Thank you.

Carl Mazurek
Associate

Proskauer
Eleven Times Square
New York, NY 10036
d 212.969.3539

f 212.969.2900

cmazurek@proskauer.com

greenspaces

Please consider the environment before printing this email.

This message and its attachments are sent from a law firm and may contain information that is confidential and protected by privilege from disclosure.

If you are not the intended recipient, you are prohibited from printing, copying, forwarding or saving them. Please delete the message and attachments without printing, copying, forwarding or saving them, and notify the sender immediately.

This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.

=====

This email communication is confidential and is intended only for the individual(s) or entity named above and others who have been specifically authorized to receive it. If you are not the intended recipient, please do not read, copy, use or disclose the contents of this communication to others. Please notify the sender that you have received this email in error by replying to the email or by telephoning +1 212 819 8200. Please then delete the email and any copies of it. Thank you.

Our external privacy policy is available [here](#).

=====